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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

August 18, 2022

## BY E-MAIL

The Honorable Alvin K. Hellerstein United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Roberto Thompson, 04 Cr. 1225 (AKH)

25 (AKH) 8/19/2022

Dear Judge Hellerstein:

The Government submits this letter to respectfully request that the following documents maintained by the United States Probation Office ("Probation") be unsealed: (1) the chronologies detailing Roberto Thompson's supervision; and, (2) any reports related to Mr. Thompson's receipt of mental health treatment (the "Requested Documents").

As the Court is aware, the violation of supervised release ("VOSR") hearing scheduled for September 12, 2022, involves four specifications, including specifications related to transmitting interstate threats, cyberstalking, and mental health treatment.

The Requested Documents contain information relevant to the hearing, and the Government understands that they may be unsealed only upon a Court order. In addition, once in possession of the files, the Government must disclose them to the defendant pursuant to Title 18, United States Code, Section 3500 and/or pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S. 150, 154 (1972).

Accordingly, the Government respectfully requests that the Requested Documents be ordered unsealed.

Respectfully submitted,

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